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26 *Counsel for Plaintiffs; additional counsel
27 listed in signature blocks below*

28 **UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

29 CHASOM BROWN, MONIQUE
30 TRUJILLO, WILLIAM BYATT, JEREMY
31 DAVIS, and CHRISTOPHER CASTILLO,
32 individually and on behalf of all similarly
33 situated,

34 Plaintiffs,

35 v.

36 GOOGLE LLC,
37 Defendant.

38 Case No. 4:20-cv-03664-YGR-SVK

39 **JOINT STIPULATION AND [PROPOSED]
40 ORDER EXTENDING TIME FOR
41 GOOGLE TO SUBMIT DECLARATIONS
42 IN SUPPORT OF PLAINTIFFS' AUGUST
43 19 AND 23, 2022 ADMINISTRATIVE
44 MOTIONS TO CONSIDER WHETHER
45 PORTIONS OF PLAINTIFFS' FILINGS
46 SHOULD BE SEALED (DKTS. 698, 699,
47 702, 704)**

48 The Honorable Yvonne Gonzalez Rogers

49 Case No. 4:20-cv-03664-YGR-SVK

50 **JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR GOOGLE TO
51 SUBMIT DECLARATION IN SUPPORT OF PLAINTIFFS' MOTIONS TO SEAL (DKTS. 698, 699, 702, 704)**

1 Pursuant to Civil Local Rule 6-2 and 7-12, this joint stipulation is entered into between
2 Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

3 WHEREAS, on August 19, 2022, Plaintiffs filed their Administrative Motions to Consider
4 Whether Portions of Plaintiffs’ Responses to Google’s Motions to Exclude Opinions of Plaintiffs’
5 Experts Michael J. Lasinski and Bruce Schneier Should Be Sealed (“August 19 Motions to Seal”)
6 (Dkts. 698, 699);

7 WHEREAS, on August 19, 2022, Google received unredacted copies of Plaintiffs’ Motions
8 to Seal and exhibits cited in Dkts. 700 and 701;

9 WHEREAS, pursuant to Civil Local Rule 79-5(e), the deadline for Google, as the
10 Designating Party to portions of Plaintiffs’ August 19 Motions to Seal, to establish that such
11 designated material is sealable is Friday, August 26, 2022;

12 WHEREAS, Google has requested, and Plaintiffs do not oppose, an extension of time of 14
13 days to Friday, September 9, 2022 will provide Google with sufficient time to submit its declaration
14 in support of its designated materials in the filings (Dkts. 700, 701);

15 WHEREAS, on August 23, 2022, Plaintiffs filed their Administrative Motions to Consider
16 Whether Portions of Plaintiffs’ Motion to Exclude Portions of the Rebuttal Expert Report of
17 Konstantinos Psounis, and Plaintiff’s Motion to Strike Non-Retained Expert Declarations for Whom
18 Google Provided No Expert Report, Should Be Sealed (“August 23 Motions to Seal”) (Dkts. 702,
19 704);

20 WHEREAS, on August 23, 2022, Google received unredacted copies of Plaintiffs’ August
21 23 Motions to Seal and exhibits cited in Dkts. 703 and 705;

22 WHEREAS, pursuant to Civil Local Rule 79-5(e), the deadline for Google, as the
23 Designating Party to portions of August 23 Plaintiffs’ Motions to Seal, to establish that such
24 designated material is sealable is Tuesday, August 30, 2022;

25 WHEREAS, Google has requested, and Plaintiffs do not oppose, an extension of time of 14
26 days to Tuesday, September 13, 2022 will provide Google with sufficient time to submit its
27 declaration in support of its designated materials in the filings (Dkts. 703, 705);

1 NOW THEREFORE, the Parties stipulate to extend the deadline by which Google shall
 2 submit a Declaration in support of Plaintiffs' August 19 Motions to Seal (Dkts. 698, 699) to Friday,
 3 September 9, 2022, and the deadline by which Google shall submit a Declaration in Support of
 4 Plaintiffs' August 23 Motions to Seal (Dkts. 702, 704) to Tuesday, September 13, 2022.

5 DATED: August 25, 2022
 6

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1 **ATTESTATION OF CONCURRENCE**

2 I am the ECF user whose ID and password are being used to file this JOINT STIPULATION
3 AND [PROPOSED] ORDER EXTENDING TIME FOR GOOGLE TO SUBMIT
4 DECLARATIONS IN SUPPORT OF PLAINTIFFS' AUGUST 19 AND 23, 2022
5 ADMINISTRATIVE MOTIONS TO CONSIDER WHETHER PORTIONS OF PLAINTIFFS'
6 FILINGS SHOULD BE SEALED (DKTS. 698, 699, 702, 704). Pursuant to Civil L.R. 5-1(i)(3), I
7 hereby attest that each of the signatories identified above has concurred in the filing of this document
8

9 Dated: August 25, 2022

By /s/ Andrew H. Schapiro

10 Andrew H. Schapiro

11 *Counsel on behalf of Google*

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[PROPOSED] ORDER

Pursuant to stipulation of the Parties, the Court hereby **ORDERS**:

3 The deadline for Google to submit a Declaration in support of Plaintiffs' Administrative
4 Motions to Consider Whether Portions of Plaintiffs' August 19, 2022 Filings Should Be Sealed
5 (Dkts. 698, 699), shall be extended to September 9, 2022.

6 The deadline for Google to submit a Declaration in support of Plaintiffs' Administrative
7 Motions to Consider Whether Portions of Plaintiffs' August 23, 2022 Filings Should Be Sealed
8 (Dkts. 702, 704), shall be extended to September 13, 2022.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

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DATED:

HON. YVONNE GONZALEZ ROGERS
United States District Judge